

## **REMARKS**

Claims 1, 4, 8-15, and 19 have been amended. Claims 1-22 remain pending in the application. Reconsideration is respectfully requested in light of the following remarks.

### **Section 101 Rejection:**

The Examiner rejected claims 1-22 under 35 U.S.C. § 101 as allegedly being directed to non-statutory subject matter. Specifically, the Examiner submits that claims 1-22 can be interpreted to be embodied on abstract mediums, that the claims recite purely mental steps, and that the claimed methods are not tied to another statutory class and do not transform underlying subject matter. The Examiner further submits that in claims 1, 8, and 15, “the claimed component is interpreted as being software per se.”

As noted above, independent claims 1, 8 and 15 have been amended. For example, claim 1 has been amended to more clearly indicate that various steps of the claimed method are implemented by a client computer and components of a server computer. Similarly, claim 8 has been amended to recite a computer readable storage medium storing program instructions that are executable by a computer to implement the functions recited therein. Claim 15, which is directed to a system, has been amended to more clearly point out the hardware components of the system (e.g., a client computer, and a server computer) that carry out the functionality recited therein.

For at least the reasons above, Applicants respectfully request removal of the rejection of claims 1-22 under 35 U.S.C. § 101.

### **Section 102(b) Rejection:**

The Examiner rejected claims 1-6, 8-13 and 15-21 under 35 U.S.C. § 102(b) as being anticipated by Perkowski et al. (U.S. Publication 2004/0210479) (hereinafter “Perkowski”). Applicants traverse the rejection for at least the following reasons.

Applicants assert that the rejection is improper because Perkowski is not a prior art reference. More specifically, the Perkowski patent was filed on June 24, 2003, after Applicants' filing date of October 29, 2001. Perkowski is a continuation-**in-part** of U.S. Patent Application serial number 09/716,848, filed on November 17, 2000. However, the November 17, 2000 filing date can only be used as Perkowski's prior art date for the subject matter that is common to both the Perkowski patent and the parent application. It appears that several of the passages cited in the Examiner's rejection of Applicants' claims were not included in the earlier parent application and are therefore not prior art.

Applicants note M.P.E.P. 2136.03 (IV), which states that for prior art purposes, a U.S. patent or patent application publication that claims the benefit of an earlier filing date under 35 U.S.C. 120 of a prior non-provisional application would be accorded the earlier filing date as its prior art date under 35 U.S.C. 102 (e), provided the earlier-filed application properly supports the subject matter relied upon in any rejection in compliance with 35 U.S.C. 112, first paragraph. In other words, the subject matter used in the rejection must be disclosed in the earlier-filed application in compliance with 35 U.S.C. 112, first paragraph, in order for that subject matter to be entitled to the earlier filing date under 35 U.S.C. 102(e).

Applicants assert the rejection is improper since at least some of the subject matter of the Perkowski reference relied upon in the Examiner's rejection is not disclosed in the parent application and is therefore not prior art.

Applicants further assert that, as discussed in detail below, even if the Perkowski application were qualified as prior art to the present application, it does not anticipate Applicants' claims.

Regarding claim 1, Perkowski fails to disclose *a client computer displaying a first page in a high order presentation language, wherein the first page is associated with a form and said form is correspondingly mapped to a respective provider of server-side*

*processing deployed upon a server.* In remarks directed to claim 15, the Examiner submits that Perkowski teaches *a client computer displaying a first page in a high order presentation language, wherein the first page is associated with a form* in paragraph [0115]. This passage describes the use of a GUI that comprises a number of display structures. It does not, however, describe a page in a high order presentation language that is associated with a form, or that such a form is mapped to a respective provider of server-side processing (i.e., one which generates a second page in a high order presentation language in response to an action implemented on the first page, as in Applicants' claim). The Examiner also cites paragraph [1722], which describes a method for editing user information through a GUI and saving the changes in the database. This passage fails to teach the specific limitations of Applicants' claim regarding a form mapped to a provider of server-side processing. In addition, it appears that the subject matter of paragraph [1722] is not found in the parent application of Perkowski. Therefore, the rejection is improper.

Further regarding claim 1, Perkowski fails to disclose *the client computer receiving user input indicating an action to be implemented on the first page; in response to said receiving: said provider generating a second page in a high order presentation language; wherein said generating comprises... in response to said calling a corresponding render method and dependent on the performance of said action, said render method performing: populating a name value pair with corresponding data; applying said name value pair populated with said data to a vehicle for displaying dynamic content on pages in a high order presentation language; and drafting said second page.* The Examiner cites various paragraphs of Perkowski as teaching said populating, said applying, and said drafting. However, the cited passages do not disclose the specific limitations of Applicants' claims, as arranged in the claim. For example, the Examiner's cited passage in paragraph [0024] describes the use of a data-entry screen (GUI) for entering a UPC number in a UPN-Directed Information Access Mode. The Examiner's cited passage in paragraph [0320] describes a Product-Description Directed Search Mode. In these modes, UPC values or other product descriptors entered on a data-entry screen may be mapped to the URLs of existing web pages containing

consumer information for a corresponding product. Neither of these passages describes the use of a re-usable helper class method and/or a re-usable render method to perform actions on a first page and to generate a second page dependent on the action, respectively. The Examiner's cited passage in paragraph [1086] describes a data table of a relational database management system (RDBMS) that maintains information about email transmissions made from each virtual kiosk in the system. **It teaches absolutely nothing about Applicants' claim.**

In remarks regarding claim 15, the Examiner further cites paragraph [0238] as teaching limitations similar to those quoted above. This paragraph describes a system in which HTML-encoded documents are served to a client and server-side Java Applets embedded therein are used to access existing consumer product related information stored in a relational database. This also fails to teach the specific limitations recited in Applicants' claims regarding the generation of a second page dependent on actions taken on a first page (i.e. a first page associated with a form mapped to a corresponding provider of server-side processing), or the use of re-usable helper class methods and re-usable render methods in this generation.

For at least the reasons above, the rejection of claim 1 is unsupported by the cited art and removal thereof is respectfully requested.

Claims 8 and 15 include limitations similar to those of claim 1. Therefore the arguments presented above apply with equal force to these claims, as well.

### **Section 103(a) Rejection:**

The Examiner rejected claims 7, 14 and 22 under 35 U.S.C. § 103(a) as being unpatentable over Perkowski in view of Gardner et al. (U.S. Publication 2002/0077958) (hereinafter "Gardner"). Applicants traverse the rejection of these claims for at least the reasons given above in regard to the claims from which they depend.

In regard to the rejections under both § 102(b) and § 103(a), Applicants assert that numerous ones of the dependent claims recite further distinctions over the cited art. Applicants traverse the rejection of these claims for at least the reasons given above in regard to the claims from which they depend. However, since the rejections have been shown to be unsupported for the independent claims, a further discussion of the dependent claims is not necessary at this time. Applicants reserve the right to present additional arguments.

## CONCLUSION

Applicants submit the application is in condition for allowance, and notice to that effect is respectfully requested.

If any fees are due, the Commissioner is authorized to charge said fees to Meyertons, Hood, Kivlin, Kowert, & Goetzel, P.C. Deposit Account No. 501505/5681-91000/RCK.

Respectfully submitted,

/Robert C. Kowert/

Robert C. Kowert, Reg. #39,255  
Attorney for Applicants

Meyertons, Hood, Kivlin, Kowert, & Goetzel, P.C.  
P.O. Box 398  
Austin, TX 78767-0398  
Phone: (512) 853-8850

Date: November 19, 2008